

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

STEVEN G. MILLETT, MELODY J. MILLETT,)	
On Behalf Of Themselves and All Others)	
Similarly Situated,)	
)	
Plaintiffs,)	
)	Case No. 05-599-SLR
v.)	
)	
TRUELINK, INC.,)	
A Trans Union Company,)	
)	
Defendant.)	

DECLARATION OF LUCY DUNI

I, Lucy Duni, having been duly sworn, state as follows:

1. I am over 18 years of age and I make this declaration on personal knowledge and in support of TrueLink Inc.'s, now known as Trans Union Interactive, Inc. ("TrueLink") Motion to Strike Testimony of Ronald Dimbert.

2. I am currently employed by TrueLink as the Vice President-Marketing.

3. After graduating from college in 1998, I was hired as a Marketing Specialist by TrueLink. I was then promoted to Marketing Manager in 2003. I was, again, promoted to Director of Marketing in 2005 and finally moved into the position of Vice President-Marketing in 2007.

4. As part of my job responsibilities as Vice President-Marketing, I oversee the development, layout and design of TrueLink's TrueCredit.com internet portal and I supervise and manage individuals who manage the products on that site. I also oversee the marketing and distribution of our newsletter and I oversee our various marketing campaigns, including the marketing of TrueLink's credit monitoring product.

5. TrueLink's TrueCredit.com website comprises, as it did since at least January of 2003, numerous pages with detailed product descriptions, samples, and other marketing materials advertising and explaining its products.

6. Through TrueLink's TrueCredit.com website, TrueLink offers consumers access to information in their credit report from the three national credit bureaus (including Trans Union), as well as credit scores, and related products.

7. As it did since at least January, 2003, the TrueLink credit monitoring product that I understand Ms. Millett purchased on behalf of her husband on August 6, 2003, monitors the Trans Union credit report of the subscriber and notifies the subscriber by email when there are certain types of changes to only that credit report.

8. Since at least as early as January, 2003, a visitor to the TrueCredit.com website would enter that site from its homepage or a landing page regardless of whether the visitor came to the site via link from another webpage, by search results offered through a search engine, or by use of one of the domain names pointing to this site.

9. Though the contents of the homepages and landing pages have changed many times over the period from January, 2003 to the present, each of the homepages/landing pages contains information about the types of products offered by TrueLink.

10. The TrueCredit Page attached to this affidavit as Exhibit 1 is not a homepage or landing page. Since January, 2003, and for all times that the TrueCredit Page was in use, a consumer could only view this page after landing on the TrueCredit website and clicking through one or more of the hyperlink buttons that appear on homepage, landing page or subsequent pages in the site.

10/29/2007 11:00 3125291010

TRANSUNION

PAGE 03

11. At all times while the TrueCredit Page was part of the TrueCredit website, it had hyperlink buttons titled "Learn More" that allowed customers to get additional information about the TrueCredit products.

Under 28 U.S.C. § 1746, I verify under penalty of perjury that the foregoing is true and correct.

Dated: October 29th, 2007

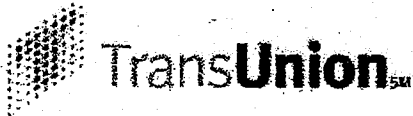

Lucy Duni

EXHIBIT B

home

privacy

help



Don't worry about your credit. Let our award-winning monitoring service take care of it!

Knowledge: quarterly access to your credit report with analytical tools.

Protection: Complete identity theft protection with weekly fraud-watch emails.

Convenience: Toll-free credit specialists with fraud resolution services.



☒ Yes, monitor my credit score for an additional \$4.95/quarter

☒ Yes, monitor my debt for an additional \$4.95/quarter

Start monitoring my credit today for just \$10.95 per quarter >>

Yes, keep me informed

As a member, you'll receive ALL THIS-



Access
to trained
specialists

New account opened in your name

Data opened: January 1, 2001
Creditor's name: Motor Credit Company
Account number: 12345678 9000
Type: Automotive Loan

Weekly Fraud-Watch Emails

- ▶ Receive weekly email alerts to changes in your report
- ▶ Immediately find out about credit report changes including fraudulent activity, new inquiries, new accounts, late payments, and more

[Learn More](#)

Quarterly Access to Your Credit Report

- ▶ Receive a brand new credit report four times per year
- ▶ Reports are easy-to-read with color graphics and free interactive guide

[Learn More](#)

Credit Alert

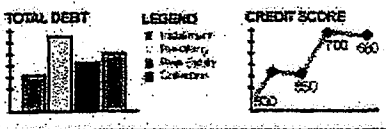
Dear Sample,
A change has appeared on your credit report during the week of January 1-7, 2003. Simply [click here](#) for details.

NEW! Fraud Resolution Services

- ▶ Should you become a victim of identity theft, TrueCredit provides you with Fraud Resolution services to assist you in the recovery of financial and credit losses

[Learn More](#)

EXAMPLE: CREDIT TRENDING



Powerful Tools and Analysis

- ▶ Graphical trending helps you manage your progress
- ▶ View colorful charts and graphs on changes in your debt, income, credit score, and more

[Learn More](#)

EXHIBIT C

EXHIBIT C IS REDACTED IN ITS ENTIRETY